

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the matter of)	
)	
Amendment of Part 97 of the Commission's Rules)	
Governing the Amateur Radio Service Concerning)	RM-11306
Permitted Emissions and Control Requirements)	
)	

To: The Commission

Reply Comments of Alexander Krist, Amateur Radio Station KR1ST

February 27, 2006

I. Introduction

The following are my reply comments to the reply comments filed by the ARRL on February 21, 2006.

II. Discussion

1. As history has already proven, any digital and analog mode readily adopted by the Amateur Radio Community will achieve consensus world wide on operating frequencies so that successful coexistence of different modes is guaranteed. History also teaches us that incompatible modes do not mix. This is being demonstrated and documented almost every day. Every day Pactor (Winlink) signals are interfering with bandwidth efficient PSK signals because the much touted listen-before-transmit protocols simply do not work outside of the controlled environment of the laboratory. This interference problem will only grow if (semi-) automatic stations are allowed to operate on larger band segments. A multitude of complaints will result from this,

burdening the Enforcement Bureau unnecessarily. The petition only serves to expand the Winlink network and does nothing to support the development of new digital information exchange techniques and codes. The ARRL has become a service organization with little interest in actual advancement of the Radio Art. A direct result of this focus shift is that many members feel disconnected with the organization and membership numbers are declining. Even though the ARRL portrays itself as a representative of the Amateur Radio Community, they only represent a small fraction of this Community.

2. It is unfortunate that the ARRL chooses to dismiss the large opposition to their petition as being based on fear. This is rather telling of their attitude towards reasonable and technical discussion. Perhaps this is the best indication yet of the ARRL having no intent to listen to reasonable argument and to not collaborate to achieve a compromise that will serve the Amateur Radio Community at large.

3. As the Commission can read from the many filed comments, the majority of the filers who comment on incompatible mode interference, favor a band segment set aside for such (semi-) automated transmissions. Consensus could have easily been reached on this point, and it is incomprehensible that the ARRL did not make a serious effort to reach consensus. This would have been a reasonable achievable goal.

4. The ARRL claims that they revised their "regulation by bandwidth" proposal substantially due to member and non member influence. However, if one were to compare the proposals before and after they received input from the Amateur Radio Community, one can easily see that only very minor and insignificant changes have been made and that no effort was made to reach a compromise on the much debated issue of (semi-) automatic stations. It appears that their comment procedure was for appearance only.

5. The ARRL Board of Directors (BoD) is indeed elected by their membership. However, since hardly ever a BoD voting record is presented, a member does not know how their representative has voted. This makes a mockery of what they call a democratic process. The fact that a role call vote was issued for this petition is rather remarkable and is unfortunately an exception rather than rule for the ARRL. Perhaps it is interesting to note here that one member of the BoD, Dr. Dennis Bodson, a former Chief of the Technology and Standards Division of the National Communications System and IEEE member on various standards committees, voted against the "regulation by bandwidth" petition as it is presented to you. In fact, three out of the fifteen members of the BoD voted against the petition. This is a clear indication that even within the ARRL leadership there is no consensus on this "regulation by bandwidth" petition.

III. Conclusion

No regulatory changes are currently needed to achieve the goals the ARRL petition is intended to serve. The petition, if adopted, will only lead to an increased number of complaints filed with the Enforcement Bureau while little, if anything, is gained.

In order to achieve successful integration of various analog and digital modes we need involvement of all interested parties with open discussions at a level higher than that what the ARRL displays in its reply comments, where arguments of emotions are used to dismiss sound technical reasoning. Procedures to reach compromise need to be transparent and accepted by all parties. Only then will we be able to maintain successful and fruitful relationships between all interested parties resulting in a healthy Amateur Radio Service, serving the needs of the 21st century.

I would like to urge the Commission to not adopt the amendments to Part 97 as proposed by the ARRL.

Respectfully submitted,

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